

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JACKELYN KELLER,

Plaintiff,

v.

ABOUT, INC. d/b/a DOTDASH,

Defendant.

Case No: 1:21-cv-00228 (JMF)(OTW)

ORAL ARGUMENT REQUESTED

**DOTDASH'S NOTICE OF MOTION AND
MOTION TO COMPEL ARBITRATION AND STAY THIS ACTION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant About, Inc. a/k/a Dotdash's ("Dotdash") Motion To Compel Arbitration and Stay This Action, as well as the declarations and exhibits in support thereof, Dotdash will, and hereby does, move this Court, before the Honorable Jesse M. Furman at the Thurgood Marshall United States Courthouse, Courtroom 1105, 40 Foley Square, New York, New York, 10007-1312, on a date and time to be determined by the Court, for an Order pursuant to Federal Rules of Civil Procedure Rule 12(b)(1) and 12(b)(6), the Federal Arbitration Act, 9 U.S.C. §§ 3, 4, 28 U.S.C. § 1927, and the Court's inherent equitable power: (i) compelling Plaintiff Jackelyn Keller ("Plaintiff") to arbitrate her claims pursuant to the arbitration agreement she entered into with Dotdash; (ii) staying this action; and (iii) requiring Plaintiff and her counsel, jointly and severally, to reimburse Dotdash for its costs and fees it incurred to prepare and litigate this Motion.

Dated: February 2, 2021

Respectfully Submitted,

HUNTON ANDREWS KURTH LLP

By: /s/ Robert T. Quackenboss

Robert T. Quackenboss
Sima Kazmir
200 Park Avenue
New York, New York 10166
(212) 309-1000
rquackenboss@hunton.com
skazmir@hunton.com

Jason P. Brown (*pro hac vice* forthcoming)
2200 Pennsylvania Avenue, NW
Washington, District of Columbia 20037
(202) 955-1500
brownj@hunton.com

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that, on February 2, 2021 I filed a true and correct copy of the foregoing document via the Court's electronic-filing system, which will send electronic notification of such filing to all counsel-of-record in this action.

/s/ Robert T. Quackenboss
Robert T. Quackenboss